



**Small  
Planet  
Foods™**

**ATTACHMENT 16**

**A Response from Small Planet Foods to  
'Keeping it "Organic:" Making Sense out of the Processing of Organic Food'**

We at Small Planet Foods (Cascadian Farm, Muir Glen, and Fantastic Foods) are strongly opposed to the changes in organic processing standards suggested in this essay by Kate Clancy and Fred Kirschenmann. The authors' logic and supporting arguments are severely flawed and would, if adopted, cause a major decline in the growth of the organic industry and our ability to change world agriculture.

Our company goal is to market organic food products as a means to transform agriculture from conventional production to organic production. We believe that organic agriculture offers the best solution to the problems of conventional agriculture: food safety; pesticide contamination of air, groundwater, and waterways; nitrate contamination of groundwater; and farm worker safety. We believe that our company goal is consistent with that of the organic community: to change chemical agriculture to organic agriculture.

Small Planet Foods has been engaged in the production and sales of organic foods for more than 27 years. Our company and our staff have contributed greatly to the development of State, private, and National organic standards that are both strong enough to preserve the integrity of the term "organic" and practical enough to encourage the conversion of farms and processing facilities to organic production and processing methods. This response is grounded in our experience in production scale organic farming, in organic marketing, and in organic standards development and is motivated by our belief that the changes in organic processing standards suggested by Clancy and Kirschenmann would be detrimental to the organic industry if adopted.

The philosophical foundation of Clancy and Kirschenmann's essay is that organic farming is not only well defined, but that there is widespread agreement within the organic industry regarding this definition ("...an organic farm is a holistic, agroecological unit, functioning as a self regulating, natural organism that recycles nutrients and keeps pests in check"; "Farms that are not organized as whole, self-regulating natural systems, farms that rely on off-farm inputs, and use therapeutic interventionist strategies to control pests, cannot be called 'organic'..."). The authors' logic follows that because organic processing does not fit this "holistic" philosophical view it is both inconsistent and incompatible with organics. We challenge this romantic, idealistic definition of organic farming. In truth, organic farming as a philosophy or as an ideal is probably well defined and agreed upon. But, as a practice, organic farming is not so well defined nor agreed upon. While we concede that such "holistic" farms probably do exist in the world today, it is clear that they are the rare exception and certainly not a basis for either definition or for standards setting. We have worked with hundreds of organic farmers in several

countries and have rarely seen such a farm. The authors' description of organic farms may be the "ideal" but it certainly does not describe the "real world" norm. The authors' idealization of reality is detrimental to the process of organic standards development because it creates a false impression of the true state of the art. If organic standards are to change the agricultural world, they must acknowledge the fact that organic farming and processing have not reached the ideal state described in the authors' essay but, rather, are in a constant state of refinement and improvement as they move from the current state of the art toward the theoretical ideal. Basing organic standards on the theoretical ideal prevents those who would otherwise convert to organic and work to improve their farms and processing operations from doing so. The highly restrictive standard suggested by Clancy and Kirschenmann is counter productive to the goals of achieving adherence to organic production and processing practices, of creating a safer food supply, and of improving the environment. Crafters of organic standards must continue to recognize that both organic farms and organic processing operations are on a continuum of improvement that leads to the more "holistic" world of agriculture that the authors view as "generally agreed upon." Organic standards must continue to provide reasonable exemptions and variances for organic farmers and organic processors that can be phased out as the state of the art improves over time.

The basic premise of the Clancy/Kirschenmann essay is that the organic industry has not yet developed an understanding of organic processing and that the purpose of their essay is to begin the process of crafting a philosophy for organic processing. We believe that the organic industry has a very clear understanding of organic processing and the principles that govern organic processing practices. The process of internal debate by the organic industry on the principles of organic processing does not begin with the writing of this essay, as suggested by the authors, but began over a decade ago as private and State certifying agents first began to create standards to govern the certification of organic processors. The development of such standards generated much internal scrutiny, disagreement, and debate within the organic community. This debate, like the decades of debate over organic farming standards by these same certifying agents, has continued to the present and will continue into the future as our industry standards are necessarily revised and upgraded through time.

The continuing development of organic processing standards was further facilitated when the OFPA was passed into law. The development of organic processing standards that resulted in the recommendations of the Charter National Organic Standards Board was a result of unprecedented discussion and debate over organic processing by all stakeholders of the organic community. For the authors to state that the NOSB did not define organic processing standards is simply a denial of the facts of the NOSB process from 1992 through 1996.

A key argument of the authors is that synthetic materials are inconsistent with organic philosophy and should not be allowed in organic processed foods. But the standards of every U.S. and international organic certifying agent allow synthetic materials to be used on certified organic farms (synthetic inert ingredients in crop & livestock materials, soaps, oils, pheromones, etc). These synthetic materials must be consistent with organic

philosophy or they would be prohibited. If some synthetic materials are consistent with organic farming philosophy, then, logically, some synthetic materials are consistent with organic processing philosophy. So, given the fact that some synthetic materials are internationally recognized as consistent with organic philosophy, to argue that all synthetic materials should be prohibited for organic processing is ridiculous.

The current organic processing standards of the vast majority of U.S. and international organic certifying agents allow the use of some synthetic materials in certified organic foods. The international organic community recognizes that some synthetic processing materials are consistent with organic philosophy. The Charter NOSB was well aware of this fact and worked to assure that its recommendations for National Organic Standards for processing would be consistent with the prevailing standards and materials lists of the organic industry. The authors' assertion that the "NOSB was reduced to permitting synthetics based solely on their 'essentiality' for the manufacture of the intended product" is an insult to the NOSB, USDA, and the organic community. The NOSB procedures for evaluating processing materials represent the most thorough and comprehensive scientific review of processing materials ever conducted by any body in the international organic community. Every processing material reviewed by the NOSB was subjected to the review of a Technical Advisory Panel which thoroughly evaluated data concerning the material's environmental impact, the food safety implications of its use, its consistency with organic principles, and other criteria required by the OFPA. In addition, the NOSB has adopted additional criteria for evaluation of synthetic processing materials and has recommended "sunset" provisions that require review and removal from the National List of any materials deemed to be unsafe, harmful to the environment, inappropriate for organic processing, or unnecessary.

To further their argument against synthetic materials in organic processed foods, the authors state that consumer comments received by USDA during the comment period on the proposed rule show that consumers do not want synthetics in certified organic foods. We believe that, with regard to consumers' comments about synthetic materials, we must examine all the data, examine how data were collected, interpret the results, and then formulate a conclusion. During our many years in the organic marketplace and during the eleven combined years that members of our company have served on the NOSB Processing Committee, we have had the opportunity to discuss synthetic processing materials with many consumers and many representatives of consumer groups. Generally, we have found that most consumers are scared by the word "synthetic" and think, initially, that synthetic materials should not be used by organic farmers or processors. After explaining to consumers that soaps, oils, and pheromones are "synthetic" but consistent with organic farming practices, we have found that they agree that some "synthetics" are OK. When it is explained that some common food ingredients such as baking powder (found in everyone's kitchen) are "synthetic," we have found that consumers agree that some "synthetics" are OK in organic processed foods.

The authors also challenge the types of processing methods that should be permitted for organic processing stating that organic standards should not allow processing methods other than those typically used in home kitchens. They further argue that food processing

which fails to retain the original integrity of the food produced on organic farms should not be labeled "organic" and that when food produced on organic farms is combined with non-organic ingredients it should not be labeled "organic." The authors' position that consumers of organic foods do not want to eat foods that could not be processed in the home kitchen is analogous to the position that consumers will only eat foods that are produced on farms using horses or mules for power. (Do the authors support the use of fossil fuels on organic farms? Clearly tractors and the use of non-renewable resources are not consistent with "self regulating natural systems.") Oil expeller presses, concentrators, and other basic processing equipment used in the most rudimentary food processing are not found "in the kitchen." To argue that their use should be prohibited in organic processing is unreasonable.

In defining organic processing the authors state: "If 'organic' is an adjective that describes a particular system of farming, then the only food that can be called organic is food that comes directly from such farms. Since processing is not a part of the farming system that 'organic' describes, technically there can be no 'organic' processing." This statement is tantamount to saying that if an organic crop is grown in California and then cooled, packed, and shipped to Boston it is no longer "organic" because cooling, packing, and shipping are "not part of the farming system that 'organic' describes."

We also object to the authors' position that acceptable organic food processing methods should be based on some measure of the retention of the original integrity of the food produced on the farm. We believe this approach is fatally flawed because all food processing, from the most basic processes such as cleaning, removing the outer coat of a seed, grinding, and cooking to complex processes such as enzyme conversion of starch and expeller pressing of oil, affect the integrity of the food produced on the farm. We point out that the negative effect on the integrity and nutritional quality of food is quite often more severe when mechanical processes and processes that have been traditionally used "in the kitchen" are used to process food than when non-mechanical processes such as enzyme, high vacuum-low temperature, and high temperature-short time processing are used. The authors' approach to restricting organic processing methods is inconsistent with international organic industry standards, is off-target with respect to consumer expectations, and is completely impractical. We support the current, widely accepted organic industry methods for evaluation of processing practices that are consistent with organic principles. These evaluation methods have served the organic industry well by allowing processing practices that make foods more digestible, more palatable, less prone to spoilage, and safer while maintaining the basic nutritional quality of the food.

The authors have, again, failed to recognize existing organic processing standards and the work of the Charter NOSB by suggesting a "two-pronged standard" for organic processing based on an old FTC model. In fact, all current organic processing standards and the recommendations of the Charter NOSB constitute a "two-pronged standard" as there are restrictions placed on both materials (ingredients and additives) and processing methods. The NOSB did, in fact, make recommendations to prohibit certain processing practices such as irradiation, chemical extraction, chemical peeling, and other types of chemical processing which are all inconsistent with organic philosophy.

The authors' suggestion that foods labeled as organic should not contain any non-organic ingredients is unreasonable and inconsistent with the OFPA. Domestic and international organic standards recognize the use of up to 5 percent (by weight) of non-organic ingredients in organic processed foods. These standards place significant restrictions on the types of non-organic ingredients that can be used. This "exemption" in organic processing standards recognizes that certain ingredients (water, salt, minerals, etc.) cannot be organic because they are not farm products. This "exemption" is also consistent with longstanding organic philosophy which recognizes that organic farmers need certain production "exemptions" such as those granted for pesticide treated seed, non-organic planting stock, synthetic inert ingredients, synthetic micronutrient sprays, emergency provisions for use of non-organic feed, and pesticide residues.

Finally, the authors state in the last paragraph of their essay that: "Organic foods are attractive in the marketplace precisely because they are differentiated. Consumers buy organic because it is "different" --- raised differently, processed differently." We agree completely with this statement and firmly believe that consumers are endorsing multi-ingredient organic processed food products every day. This consumer endorsement is based on actual retailer and distributor organic processed food sales volume not on speculative opinion regarding what consumers want. While the authors use the above statement to argue that organic processed food products cause a loss of market differentiation, consumers' widespread acceptance of organic processed foods proves that their argument is wrong. Organic processed food products are highly differentiated and the only real possibility of this changing would be if the authors' proposed organic processing standards prevailed.

As an industry committed to changing the face of agriculture, we must not be influenced by the kind of thinking that would only marginalize our capabilities. We must use logic and reason to assure that organic food production, which includes processing, packaging, shipping, marketing, distribution, and other non-"eden-like" pursuits, is not relegated to a small niche. At the same time, we need to provide encouragement to improve organic farms and organic processing operations rather than a philosophical approach that discourages them or, even worse, denies them participation in our opportunity. Please join us in sending a resounding vote of "nonsense" to the authors of "Keeping it 'Organic:' Making Sense out of the Processing of Organic Food." Thank you.

Gene Kahn  
Chief Executive Officer  
Charter NOSB Member

Craig Weakley  
Vice President, Agriculture  
Charter NOSB Member